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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ENOCH ADAMS, JR., LEROY ADAMS,)
ANDREW KOENIG, JERRY NORTON,)
DAVID SWAN, JOSEPH SWAN,)
Plaintiffs,)
vs.)
TECK COMINCO ALASKA)
INCORPORATED,)
Defendant,)
NANA REGIONAL CORPORATION, and)
NORTHWEST ARCTIC BOROUGH,)
Intervenor-Defendants.) Case No.: A04-00049 CV (JWS)

)

DECLARATION OF RACHEL DAVIS

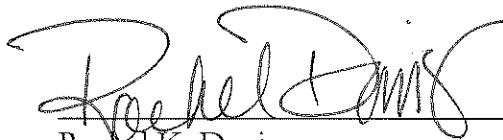
I, Rachel Davis, depose and aver as follows:

1. I have personal knowledge of and am competent to testify to all facts set forth in this declaration.
2. I am employed by Hartig Rhodes Hoge & Lekisch, PC as a paralegal. Hartig Rhodes serves as counsel for Teck Cominco Alaska Incorporated in the above

captioned matter. I am familiar with this case and disclosures made by Teck Cominco to the plaintiffs.

3. Attached as Attachment 1 to my declaration is a true and correct copy of pages 002489 and 002490 produced in Plaintiff's Initial Disclosures.
4. Attached as Attachment 2 to my declaration is a true and correct copy of excerpts from the deposition of Mark Thompson dated March 3, 2005.
5. Attached as Attachment 3 to my declaration is a true and correct copy of excerpts of the Affidavit of Mark Thompson Regarding TDS dated October 3, 2005 filed with this court at Docket 100.
6. Attached as Attachment 4 to my declaration is a true and correct copy of a Memorandum from Jeff Weaver to Mark Thompson dated March 23, 2006 re Red Dog Water Balance Considerations, Bates numbers TC 037778-037783 RD produced in Teck Cominco's Supplemental Disclosures dated November 16, 2006.
7. Attached as Attachment 5 to my declaration is a true and correct copy of excerpts from Teck Cominco's Permittee's Petition for Review filed with the Environmental Appeals Board on April 11, 2007.
8. The work performed by Ecology and Environment was produced to the plaintiffs as bates numbers TC 31640 RD to TC 31744 RD in Teck Cominco's Supplemental Disclosures dated December 6, 2004.
9. Ms. Tsuji was asked numerous questions about the work of Exponent in her deposition of February 1, 2005, including testimony at pages 14:8-16; 121:11-124.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Rachel K. Davis

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2008,
a true and correct copy of the foregoing was served,
via electronic service, on the below identified parties of
record:

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s/Sean Halloran
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